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Attorneys for Defendant Robert Ladd

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	Case No. 1:18-cv-08175-ER
)	
v.)	
)	
BARRY C. HONIG,)	ORAL ARGUMENT REQUESTED
<i>et al.</i> ,)	
)	
Defendants.)	
)	

**NOTICE OF DEFENDANT ROBERT LADD'S MOTION TO DISMISS
THE SECOND AMENDED COMPLAINT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(6)**

PLEASE TAKE NOTICE that at a date and time to be determined by the Court,

Defendant Robert Ladd by and through counsel will move this Court for an order dismissing Plaintiff's complaint as to Mr. Ladd for failure to state a claim upon which relief may be granted

pursuant to Federal Rule of Civil Procedure 12(b)(6) and granting such other relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd will rely on the accompanying Memorandum of Law in Support of Defendant Robert Ladd's Motion to Dismiss the Second Amended Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Request for Judicial Notice and the exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that Mr. Ladd requests oral argument.

Dated: April 30, 2020

Respectfully submitted,

/s/ Randall R. Lee
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